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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

**MARTELL HERNANDEZ, et al.,**

Plaintiffs,

v.

**ROSIE BERNAL, et al.,**

Defendants.

2:24-cv-01217-TLN-JDP

**JOINT STIPULATION TO AMEND  
DISCOVERY DEADLINE; ORDER**

Judge: The Honorable Troy L. Nunley  
Action Filed: April 25, 2024

Whereas the parties are cooperating with each other in the discovery process, written discovery is still pending, and depositions of both lay and expert witnesses are still to be taken, the parties request additional time to complete discovery beyond the time allowed by the Court's Initial Pretrial Scheduling Order (ECF No. 3), currently set for August 21, 2025.

Therefore, Plaintiffs Martell Hernandez, Ericka Hernandez, Eulia Hernandez, and MDH, and Defendants Love, Bernal, Breckner, and Caong, by and through their counsel of record, hereby stipulate, and request the Court's approval, to modify the original discovery deadline from August 21, 2025 to March 1, 2026, the date proposed in the parties' Joint Proposed Discovery Plan. (ECF No. 15).

1 Dated: March 20, 2025

Respectfully submitted,

2 ROB BONTA  
3 Attorney General of California  
4 CASSANDRA J. SHRYOCK  
5 Supervising Deputy Attorney General

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7 PAUL KOZINA  
8 Deputy Attorney General  
9 *Attorneys for Defendants*  
10 *Love, Bernal, Breckner and Caong*

11 Dated: March 20, 2025

Respectfully submitted,

12 LAW OFFICES OF CLAUDIA C. BOHORQUEZ

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14 CLAUDIA C. BOHORQUEZ  
15 *Attorneys for All Plaintiffs*

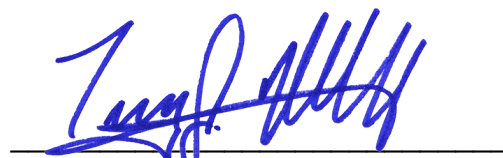
16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS ORDERED:

18 The deadline for completing fact discovery, as defined in this Court's April 29, 2024  
19 Order (ECF No. 3), is modified to March 1, 2026.

20 IT IS SO ORDERED.

21 Dated: March 21, 2025

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24 Troy L. Nunley  
25 Chief United States District Judge  
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